UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
AEB Wheeling Office
REGION III

Investigative Report

U.S. STEEL

Clairton Works
Clairton, PA

Prepared by: William G. Klettner
Civil Investigator

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
AIR ENFORCEMENT BRANCH, REGION III
Wheeling Office
303 Methodist Bldg., 11th & Chapline Streets
Wheeling, West Virginia 26003-2995

MEMORANDUM

SUBJECT: **Investigation Report, U.S. Steel Coke Works & tar decanter sludge Lagoon** **DATE:** 7/26/93

FROM: William G. Klettner (3AT23)
AEB Wheeling Office

TO: Bernard E. Turlinski (3AT20)
Chief, Air Enforcement Branch

Attached is a copy of the Investigative Report on U.S. Steel's Clairton, PA Coke Plant tar decenter sludge recycle project for your review. If you have any questions, please call (304) 234-0236.

cc: Denis Lohman (3AT23)
Michael E. Byrnes (3CE00)
Gary Gross (3HW53)

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Investigative Report
U.S. Steel Clairton Works
Clairton, PA
July 23, 1993

Contents

I. Introduction

Company: U.S. Steel
Clairton Works
400 State Street
Clairton, PA 15025

U.S. Steel Group
A unit of USX Corporation

County: Allegheny

AFS#: 42-003-00032

Company Personnel:

Jeffery C. Faddis, Process Engineer, Plant Engineering
William Kock, Project Engineer, U.S. Steel Research
Thomas S. Hackenson, Plant Security
Thomas Stocks, Clairton Works Heating Department
Robert Matyasovski, Clairton Works Spray Man

Contractor Personnel:

Ronald Ettinger, 7-7 Inc., Supervisor
Dave Stake, 7-7 Inc., Assistant Supervisor, Lead Man
Timothy Randolph, 7-7 Inc.
Sam Park, Davy Dravo
Martin Zamberlan, Enviro Health Technologies

Allegheny County Inspectors:

William Gilson, Steel Specialist
Larry Werner, Toxicologist
Harilal L. Patel, Chief, Air Quality, Monitoring
John Logan, Air Quality Monitoring

EPA Inspector:

William G. Klettner, AEB Wheeling Office

Other individuals involved in U.S. Steel Project Tar Decanter Sludge Project:

H. Ronald McCollum, Manager, Environmental Control, Clairton Works
Robert P. Spargal, Environmental Engineer, Environmetnal Control Clairton Works
Stephen W. Bilan, Manager, Mon-Valley, Clairton & Fairless Environmental Health

John M. Kabo, Department Manager, Industrial Hygiene and Environmental Health
Anthony Nuzzo, Environmental Project Engineer
Zelda Curtiss, Assistant Counsel, PA DER
Sam Harper, Environmental Cleanup, Special Projects, PA DER
Ron Josephson, Environmental Engineer, EPA - RTP
Gary Gross, Environmental Engineer, EPA - Region III
Paul Gotthold, PA Section Chief (RCRA), EPA - Region III
Doug Donor, Land Disposal Restrictions Program, EPA - Region III
Dominic Curinga, Mayor, City of Clairton, PA

Inspection Date: July 20, 1993
Start Time: 8:45 a.m.
End Time: 2:35 p.m.

The inspection at U.S. Steel's Clairton Works on July 20, 1993 was an unannounced EPA inspection in conjunction with a planned Allegheny County Health Department Bureau of Environmental Air Quality Inspection. Mr. Gilson attempted to notify the company of the inspection approximately a half hour before it was to begin, however, no plant official was available. They were attending a meeting in Pittsburgh. Prior to entering the plant, a meeting was held with Allegheny County Inspectors Gilson, Werner and Logan to review facts of the case and plan the day's inspection strategy. A summary of sequences of events in the case is as follows:

1. Tuesday, July 13, 1993 (4:15 p.m.) - Mr. Raymond C. George, EPA WV/PA Liaison Officer received a copy of a memo regarding a citizen's complaint involving U.S. Steel's Clairton coke works. Mr. George gave this report writer a copy of that memo (see Memo - Attachment A1).

2. Wednesday, July 14, 1993 (7:45 a.m.) - I was contacted by Mr. Denis Lohman, Chief of Case Development Section, and asked to look into the matter. I informed Mr. Lohman that I was familiar with the complaint and was already working on it. He also indicated that Mr. Bernard Turlinski, Chief of the Enforcement Branch was also investigating the matter.

3. Wednesday, July 14, 1993 (1:30 p.m.) - I contacted Dominic Curinga, Mayor of Clairton, Pa., the originator of the citizen's complaint. After a lengthy conversation with Mayor Curinga, the following information was obtained:

- Mayor Curinga had received complaints from at least two individuals working at the coke plant alleging that trucks were coming into the plant at night, and the truck's contents was being pumped into Oven B1-3. The Mayor wasn't sure if the battery/oven number was correct.

- Mayor Curinga would not, or could not be specific as to the times the trucks were coming into the plant, or the dates. He did, however, say that he had received the complaints a month or two ago and had sat on them until now. He stated that the complainants wished to remain anonymous. He also stated that he had a friend working in the plant who had told him the same thing.

- Mayor Curinga indicated that he wasn't too concerned about the complaints, until odors, different from those associated with the coke plant became noticeable, and the original complainants complained again. He did admit to this report writer that the odors were recent and occurred during the hot, humid weather the area has been experiencing.

- Mayor Curinga was asked if the difference in the odors could be accounted for as coming from other plants (Hercules, Ashland Oil, etc.) in the area. He said no, but the odors were intermittent not continuous.

- When asked about the material being pumped into the coke oven, Mayor Curinga said he didn't know what it was. However, the complainants were concerned about toxic exposure. They told him the material resembled tar, and they were afraid it was a hazardous material. They claimed the company was burning the material without informing the labor force what it was.

- Mayor Curinga was asked if his informants knew from where the trucks bringing material into the plant were coming from. He said they told him it was coming from the Peter's Creek Landfill, owned by U.S. Steel.

- Upon further questioning of Mayor Curinga, it was learned that he had worked at the Clairton Works until 1981; he was familiar with the plant operation and he was familiar with the use of tar decanter residue being mixed with coal and charged to coke ovens.

- Mayor Curinga further stated he was making arrangements to have videos made of the trucks entering the plant at night. I asked him if an EPA night stake out was necessary, did he have a reliable police contact to inform them of our

activities so they would not suspect suspicious activity and also not alert U.S. Steel to our presence? (Clairton is a high crime rate area. Until recently, they had no police force, relying on County and State police for protection). He said he did. Mayor Curinga stated he had also talked with another EPA person that same day discussing the same thing with him; however, he could not remember that individual's name.

- During the conversation with Mayor Curinga, it was learned that the individuals who registered their complaints with him were his friends. When Curinga was asked to have them contact me (anonomously), because I would like to talk with them, he said he would ask. To date, they have not called.

4. Wednesday, July 14, 1993 (2:20 p.m.) - Mr. Samuel Harper, Water Quality Supervisor, PA DER, Pittsburgh Office, was contacted. He relayed the following information:

- U.S. Steel/USX Corporation entered into a Consent Agreement with the PA DER in 1990 to remove tar decanter sludge from their Peter's Creek Lagoon. The PA DER has been monitoring the Lagoon for seepage into Peter's Creek which enters into the Monongahela River. The Consent Agreement allows U.S. Steel 15 years to empty the Lagoon.

- The Peter's Creek Lagoon is located on company property adjacent to the Clairton coke works. County Road 837 seperates the two.

- The Lagoon had been used for approximately 60 years for disposal of tar decanter sludge, lime and other things. U.S. Steel made a proposal to recycle this waste through one of its coke ovens and the PA DER agreed with the proposal, however, Allegheny County's air quality group had objections. These objections were eventually worked out.

- Mr. Harper stated that the DER received complaints from union leaders at the coke plant, who were concerned with the toxicity of recycling the tar decanter sludge, as well as the odors when the pilot project began in February. He was unaware of any recent complaints.

5. Thursday, July 15, 19/93 (10:35 a.m.) - Allegheny County Health Department, Bureau of Environmental Quality, Air Quality Division, Messrs. William Gilson and William Clarke furnished the following information:

- Originally the county had many reservations about what U.S. Steel was proposing to do with the tar decanter sludge from the Peter's Creek Lagoon. After meeting with county officials, U.S. Steel was given permission to conduct a trial run for disposing of the sludge.

- Two companies are currently handling tar decanter sludge at the Clairton works. They are AJK and 7-7 Incorporated. AJK handles tar decantor currently produced by the plants 12 operating coke batteries. The tar decanter is collected, fluidized, and a diluent is added. This material is then sprayed onto coal prior to being charged into an oven. This is considered a recycled waste and is allowed by RCRA regulations. AJK also handles materials going to the Aristech plant adjacent to the coke works.

  7-7 Incorporated handles the tar decanter sludge taken from the Lagoon to be recycled in Coke Battery 9, Oven A1. The material is pumped to the oven via a 6-inch line from a specially designed delivery truck.

  7-7 Incorporated was given an installation permit to dig out the Peter's Creek Lagoon for processing and shipment to other BIF regulated sources. No recycling of this material at Clairton was to take place unless the County was notified.

- U.S. Steel asked Allegheny County for permission to do a trial test for six months, using currently produced tar decanter. The material was to be recycled at Coke Battery 9 as noted above. They received permission and began the trial runs in February, 1993.

- Since the trial runs began, the Allegheny County has received several complaints regarding odor. Allegations were made that U.S. Steel wouldn't allow anyone on the battery into which the sludge was being pumped. Allegheny County ordered U.S. Steel to stop the testing until a further review of the matter was made.

- After researching the matter with EPA (RCRA) individuals, PA DER, and U.S. Steel, Allegheny County Legal Counsel saw no legal problem with using the Peter's Creek Lagoon sludge material in the #9 Coke Battery.

  The original proposal regulation was worked on by Ron Josephson at RTP (202/260-4770) and was published in Volume 56, No. 144 of the Friday, July 26, 1991 Federal Register, entitled "*Hazardous Waste Management Systems: Identification and listing of Hazardous Waste; CERCLA Hazardous Substance Designation; Reportable Quality Adjustment, Coke By-Products Waste Listings.*" The final rule is listed in the Federal Register of August 18, 1992.

- At the Wednesday, July 14 meeting, Allegheny County imposed the following requirement for recycling the tar decanter sludge in Battery 9, Oven A1:

  1. Coke Battery 9, Oven A1 must be on a 24-hour cycle.

  2. Trial burns must take place on daylight turn.

  3. Allegheny County will monitor the burns.

  4. Only one load a day (1 ton of sludge) may be burned.

- Mr. Gilson invited this report writer to participate in an inspection of the Peter's Creek Lagoon site and #9 Coke Battery, scheduled for Tuesday, July 20, 1993. I accepted and informed Mr. Lohman of the same, who concurred.

II. Plant Investigation & Source Description

1. On Friday, July 16, 1993, U.S. Steel received permission from the County to start trial burns using Lagoon sludge.

2. Tuesday, July 20, 1993 (9:45 a.m.) - the inspection team consisting of Allegheny County representatives, Gilson, Werner, and Logan, along with this report writer went to the plant's Maple Street entrance and announced our intention to conduct an inspection. Mr. Patel, also Air Allegheny County representative went directly to the Peter's Creek Lagoon site. An attempt was made to locate a company representative, plant manager, etc., but none was available. Jeffery C. Faddis, a Process Engineer Supervisor observing the trial burn

operations was located. He, in turn, appointed a Security Guard, Mr. Thomas Hackenson to accompany the inspection team until he, Faddis, could join us. EPA/County credentials were presented at the entrance gate to both 7-7 Incorporated representatives and to U.S. Steel representatives.

The inspection team then proceeded to the Lagoon site to observe 7-7 Incorporated's operation. Upon arrival at the Lagoon, Mr. Patel informed us that a truck loaded with sludge between 9:00 a.m - 9:30 a.m., had been delivered to the plant. Not wanting to miss a sludge charge to Oven A1, Mr. Gilson and myself went back into the plant while Messrs. Werner, and Logan remained at the Lagoon conducting air sampling for Benzene emissions.

10:35 a.m. - at Coke Battery #9, we were met by Messrs. Faddis, Keck, and Koons of U.S. Steel, Mr. Ettinger of 7-7 Inc., Mr. Park of Davy Dravo, and Mr. Zamberlan of Enviro Health Technologies.

Messrs. Faddis and Ettinger stated that the first load of Lagoon sludge was delivered to the plant on Monday, July 19, and was charged to the line but not to the oven. During the pumping from the truck to the charging line, a small spill occurred when a valve on the line malfunctioned. Because the tar decanter sludge is semi-solid, the spill was easily cleaned up. This second test trial is to last six weeks. Sludge will be charged to Oven A1 once a day on the daylight turn at the same time each day.

Dave Stake, Assistant Supervisor - lead man for the 7-7 Inc. operation at the Peter's Creek Lagoon, earlier stated that pumping at the Lagoon began on February 1, 1993. Processing of the tar decanter sludge began 2½ weeks later. At that time no sludge was sent to Battery 9. Instead, it was crushed, heated, a diluent was added and then pumped into trucks for shipment to Allied Signal in Michigan; Medusa Cement, Wampum, Pa.; Lake Charles Corp., Louisiana, and Houston, Texas.

The only sludge 7-7 Inc. handled that was being recycled during the first trial run was fresh tar decanter off the plant's 12 coke batteries. All other tar decanter is handled by AJK and is applied to coal prior to charging the ovens. One-half gallon of tar decanter is applied per ton of coal charged.

According to Mr. Faddis, the company received permission to start the first recycle test on June 29. Only nine days of testing occurred. Each recycle burn was limited to one ton of currently produced tar decanter. Company officials felt that the fresh tar decanter sludge would duplicate the characteristics of the Lagoon sludge. When the pumping at the Lagoon started in February and again when the first trial run at Battery 9 began in June, the company received complaints from plant employees regarding odor and concern over exposure to toxic releases. U.S. Steel, according to Faddis, met with the union, explained what they were doing, and the

complaints ceased. At the present time, two union men are assisting in the test trials. To ensure exposure safety, each person working on the project wears a personal monitor and benzene levels are monitored by Enviro Health Technologies, a private contractor.

A. Process Description

The sludge from the Lagoon is pumped into a tar box, from there a bucket loader fills a bin on a flat bed truck, and the truck delivers the sludge to the North end of Battery #9. The pipe fitting on the truck is hooked up to a six-inch pipe line that runs up the side and across the Northeast end of the battery to fittings on a specially sealed lid on Oven A1's third charging port. The charging port is also fitted with a charging valve and steam aspiration nozzles used during charging and clean out.

The sludge delivery truck, in addition to the sludge tank, is equipped with a Putzmeister pump, power pack and 50 KW Deisel generator (see Attachments B1-B2). The Putzmeister pump is a specially built pump imported from Germany designed to pump semi-solid cement.

Prior to charging the Lagoon tar decanter to Oven A1, the Larry car short charges the oven with 12 tons of coal at the #1, #2, and #4 charging ports. A normal coal charge is 15 tons. The Lagoon sludge is then charged to the oven at the #3 port described above. A leveling bar then levels the coal across the oven and coking begins.

Coking time for Oven A1 is 24 hours so that the oven can be pushed and charged at the same time each day during the trial run. Coking times for the remaining ovens on Battery #9 is 18 hours.

During the inspection of the first sludge charged to Oven A1, the charge lasted ten minutes. The pressure on the six-inch delivery line was 400 to 800 psi at the Putzmeister pump, down to 30 to 40 psi at the charge port. One ton of sludge was pumped into the oven while a second ton of material remained in the line to be fluidized. The tonnage pumped into the oven is calculated by the number of pump strokes (53 pump strokes at 3.75 gallons per stroke, which averages 198.75 gallons, slightly less than one ton).

During the charging of sludge to the oven, a strong "sour" (cabbage) odor of benzene was noted at the truck pump area. Only a slight "sour" odor was detected on top of the battery at the charging port. Mr. Zamberlan of EHT who was air monitoring the process got a reading of 1 ppm Benzene. Once a sludge charge is completed, the system is locked out with padlocks on top of the battery and at the truck.

In order to make the trial run more efficient, and be able to use Oven A1 on weekends for normal coking, the company is proposing to add a fifth port to the oven that would be permanently in place,

attached to the six-inch delivery pipe. This would also give them the added advantage of being able to back charge coal on top of the sludge through the #3 charge port.

According to Mr. Faddis, the coke produced with the tar decanter in Oven A1 has better stability than regular coke, however, it is high in sulfur and not sold as metallurgical coke. The company is trying to find a commercial market instead.

B. Peter's Creek Lagoon Operation

11:45 a.m. - After observing operations at Battery #9, Mr. Gilson and myself returned to Peter's Creek Lagoon. While we were in the plant, Messrs. Werner and Logan conducted air monitoring at the edge of the Lagoon, at 7-7 Inc. portable processing plant, and around the site perimeter.

Using a Fox Borro, Miran B3 infrared sampler and Dragger hand sampler, they documented readings for Benzene from less than the allowable to 1 ppm up to 6.9 ppm at open tar boxes, 9.6 ppm at the excavation area, and 8.1 ppm at the entrance gate to the Lagoon. Although the readings were the highest using the Miran B2 sampler, because of fluctuations during the sampling, Mr. Logan felt that the unit might have malfunctioned.

Air sampling at the Lagoon is done twice daily by Gas Services, a contractor hired by U.S. Steel. Their records indicate Benzene readings as high as 6 ppm to 8 ppm. Readings taken the day of the inspection at 10:05 a.m. were as follows:

Lagoon	1 ppm
Equipment	0
Loading	0
Entrance	0

Gas Services also monitors for Hydrogen Cyanide having a permissible exposure limit of 10 ppm.

The Peter's Creek Lagoon is roughly three acres in size and contains approximately 70,000 tons of sludge. The material in the Lagoon is mostly tar decanter, however, according to County inspectors, there is some evidence indicating the presence of Naphthalene. No one knows for sure what is at the bottom of the Lagoon.

According to Mr. Faddis, only 33,000 tons will be pumped out of the lagoon (12 to 16 feet deep of good tar) over the next seven to ten years.

The Lagoon at the time of the inspection was covered by one to two inches of water. According to Mr. Stake, when 7-7 Inc. began pumping from the Lagoon in February, there was approximately 8 to 10 inches of mater on the surface. He further stated that the "sour" odor is worst when no water is present and evacuation of the tar takes place. 7-7 Inc. daily operation at the Lagoon begins at 4:00 p.m. when the process equipment is heated up. Excavation/pumping beings at 7:00 a.m. and continues until 7:00 or 8:00 p.m.

As noted earlier in this report, the tar decanter removed from the Lagoon either goes to the #9 Coke Battery or is processed for shipment offsite. Tar processed for offsite shipment after removal from the Lagoon is deposited in open top tar boxes, transported offsite to the Clairton Coke Plant where it is weighed and then returned back to the Lagoon processing plant.

At the processing plant, front-end loaders remove the sludge from the back of the tar boxes and redeposit it at a mixing-grinding plant, which is partially enclosed. In the enclosed section, the sludge is heated, fluidized and a diluent is added. From there it then goes to a storage tank to be pumped into tank trucks and taken offsite. Emissions off the portable plant and mixing tank are controlled by three carbon adsorption systems. As noted above, there are two storage tanks, approximately 500 gallons each and numbered 4011 and 4003. Tank 4011 "Frac Tank" contains DOERR process tar mixing materials for which no data could be obtained at the time of the inspection. Mr. Wenner was suspicious of this material and will attempt to get information on its make up.

The light "sour" odor of Benzene during the inspection was only noted at the edge of the Lagoon where excavation had taken place and at the open tar boxes. According to Mr. Stake, the tar boxes are not covered at night at the close of operations, nor is the front-end loader cleaned.

The community of Clairton surrounds the Lagoon on North, West, and South sides. However, the Lagoon is situated approximately 1/2 to 3/4 of a mile from any houses, as noted from atop 3rd Street hill at the Allegheny County Ambient Air Monitor Station. The Clairton coke works and Aristech plant site is adjacent to Route 837 and the Monongahela River to the South. This a non-attainment area.

The County monitor sits approximately ½ mile away from the Lagoon, and monitors for priority pollutants, PM-10, BAP, Benzene and Benzene solubles. According to Mr. Logan, readings of 10 ppb Benzene is the norm, however, they have recorded excursions much higher.

III. Summary & Conclusions

1. Excavation of tar decanter sludge at the Peter's Creek Lagoon started on February 1, 1993. Also, open top tar box trucks were, and still are taken from the Lagoon into the Clairton coke

works to be weighed between the hours of 7:00 a.m. and 8:00 p.m. daily. (In February-March, it is dark after 6:00 p.m.). The above activities correlate with odor and nighttime truck traffic complaints received by Mayor Curinga, who said he "sat on the complaints for at least two months before reporting them.

Both U.S. Steel and the Allegheny County Health Department received similar complaints around the same time.

2. The strong "different odor" Mayor Cruinga complained about that has occurred recently most likely came from excavation of the sludge at the Lagoon. Mr. Stake of 7-7 Inc., stated that the "sour" Benzene odor was strongest when there is no standing water on the Lagoon surface. During the past several weeks, the area experienced temperatures in the 90s with no rain and high humidity. Given the right weather condition and an inversion, the odors would be noticeable, especially when combined with odors from the coke plant and adjacent AJK/Aristech plant. In addition to the above on June 29, (during an extreme hot spell), U.S. Steel was given permission to recycle fresh tar decanter on a trial basis in Oven A1, Battery #9. As noted in the attached report, after nine days the trial test was stopped by Allegheny County receiving citizen complaints from plant workers.

Most of the complaints to the County centered around toxic work issues involving working around and on Battery #9 when the sludge was being charged to Oven A1. The complaints have stopped since the company had a series of meetings with the union and laborers, and also instituted a personal monitoring program for those working around the tar decanter sludge.

3. It is highly likely that complaints involving trucks coming from the Peter's Creek Lagoon at night were not only the tar box trucks discussed in item #1, but also Aristech trucks that were used to handle fresh tar decanter used in the first recycle trial test.

4. On Wednesday, July 21, 1993 (10:09 a.m.), Mr. Gary Gross (EPA - RCRA program), was contacted by this report writer. Mr. Gross stated he was familiar with what was going on at the coke works; he has been working with Allegheny County for the last two to three weeks. Since the material in the Lagoon was put there prior to 1980 and it is recyclable, no RCRA permit is needed. According to Mr. Gross, it is not a solid waste when it is recycled as long as no land disposal occurs.

When questioned about Allegheny County's concerns regarding the uncovered tar boxes, and transportation of same from the Lagoon into the plant for weighing, and back to the 7-7 Inc. plant for processing, Mr. Gross claimed EPA had no authority to force the company to cover the boxes because they are exempted materials being recycled. However, if they are taken offsite (another facility), they would

need to be manifested. That authority resides with the PA DER and Allegheny County.

It should be noted that Allegheny County, according to Mr. Gilson, stipulated in the agreement for the trial tests that all boxes, etc. be covered. The bin on the truck feeding the feed line at Battery #9 is covered with a tarp.

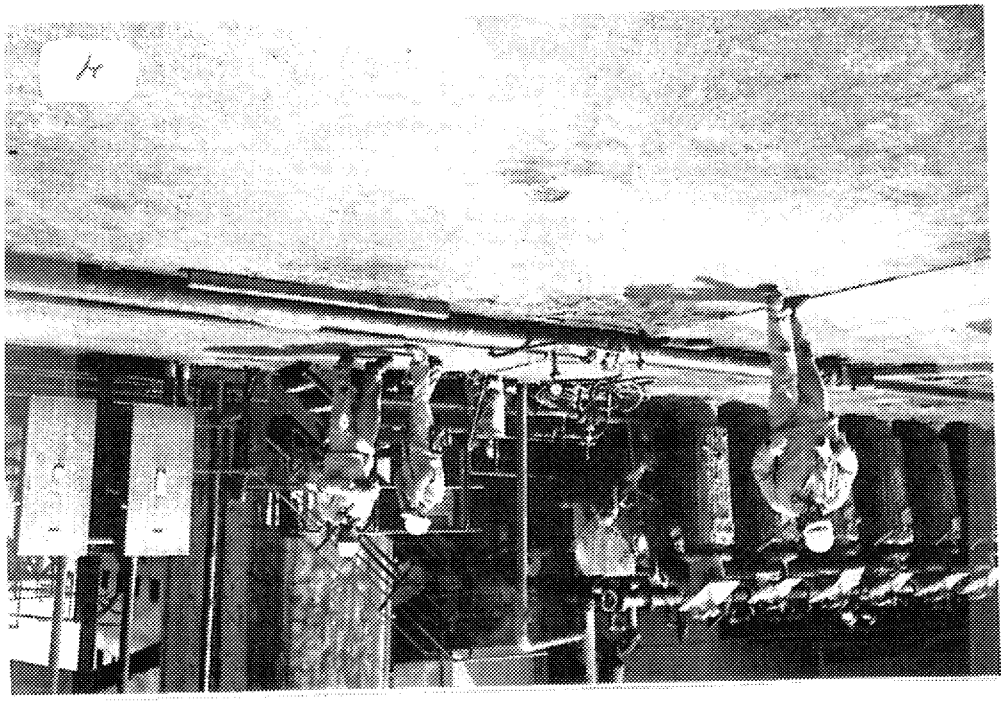
Because of the potential release of Benzene in excess of the allowable 1 ppm at the excavation of the sludge from the Lagoon; at the open tar boxes; and the transport of the open boxes from the Lagoon into the plant and back again, EPA Air Enforcement action may be necessary.

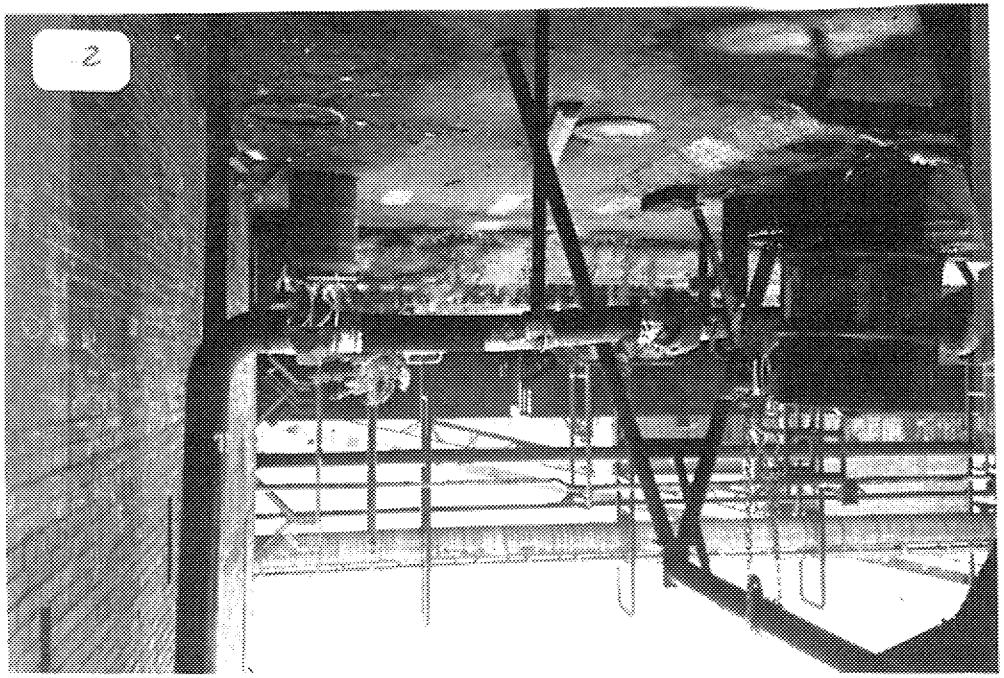
5. On Wednesday, July 21, 1992 (2:01 p.m.), this report writer was contacted by Mike Byrnes of EPA's Criminal Investigation Division. Mr. Byrnes, who had been assigned to this case after hearing the results of my investigation, stated he would hold off taking action at the present time. He requested a copy of this report.

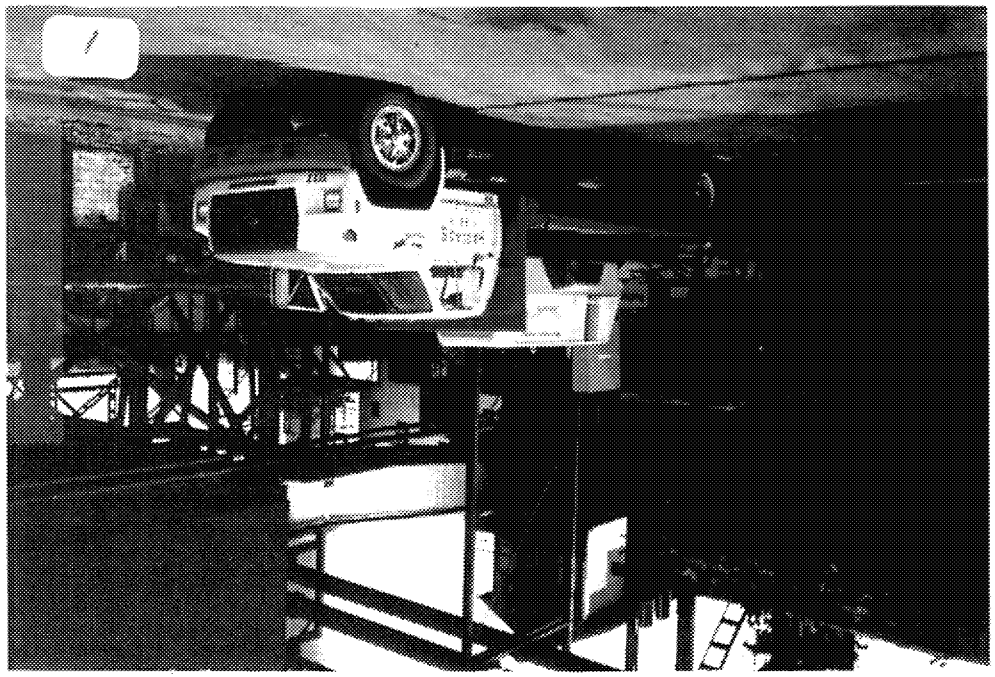
PHOTO IDENTIFICATION SHEET

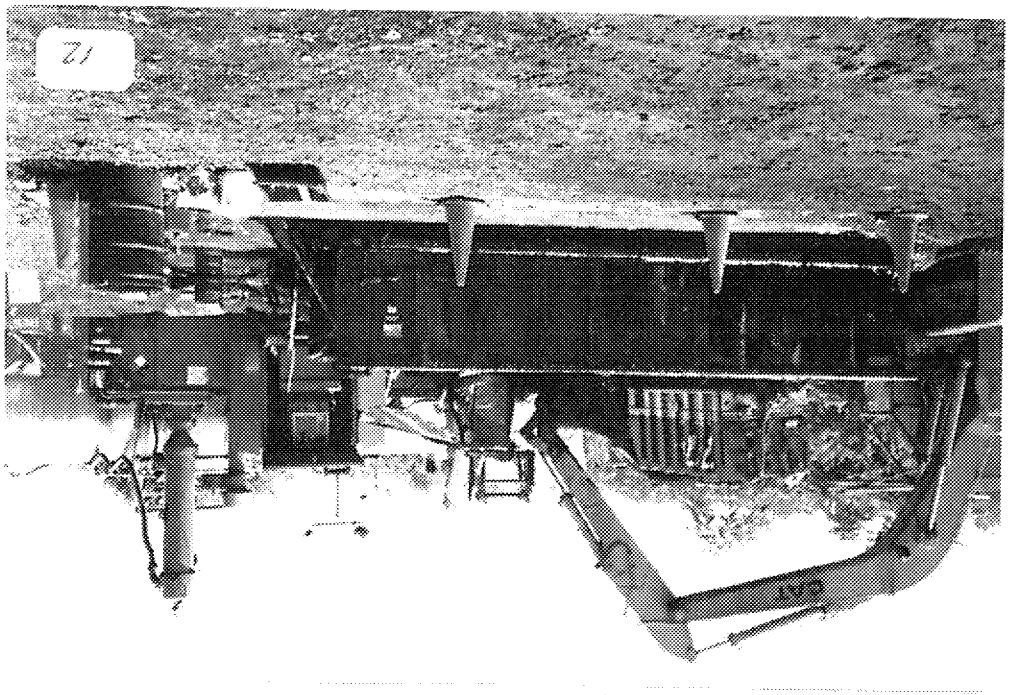
Photo Identification Sheet
U.S. Steel Clairton Coke Works & Peter's Creek Lagoon
July 20, 1993

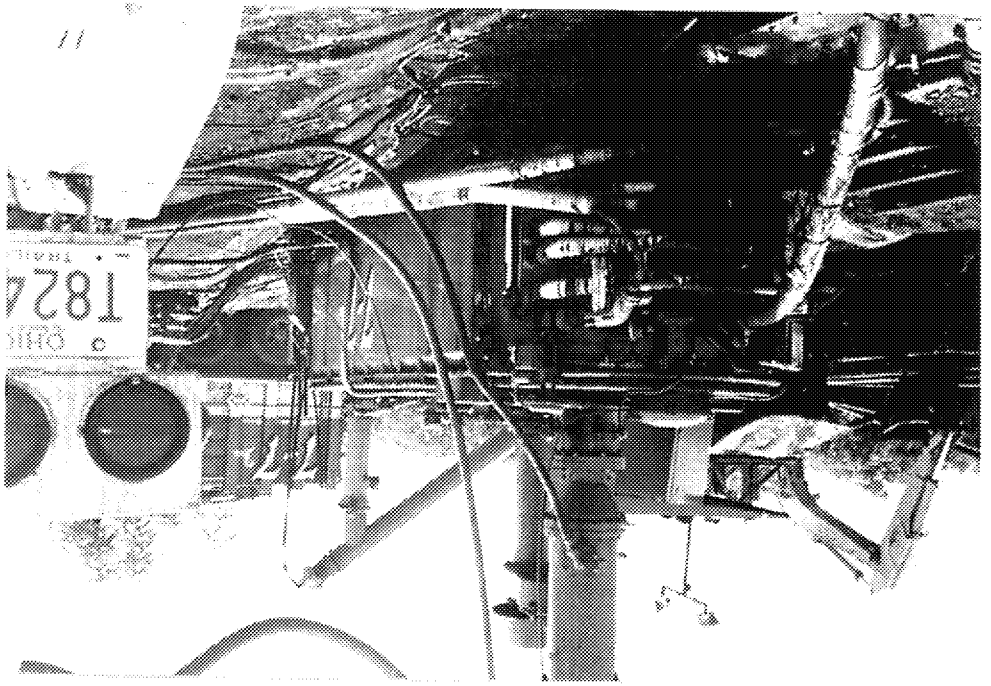
Photo No.	Time	Photo Description
1	10:40 a.m.	Photo of Lagoon tar decanter sludge transport bin at rear of truck holding sludge.
2	10:51 a.m.	Six-inch sludge delivery pipeline hookup.
3	11:00 a.m.	View of tar decanter sludge line into Oven A1 #3 charging port on top of Battery #9.
4	11:11 a.m.	After sludge charge finished, 6" charging line locked out.
5	11:50 a.m.	Excavation area for the decanter sludge.
6	11:52 a.m.	View of Peter's Creek Lagoon looking Southwest.
7	11:53 a.m.	Tar decanter sludge at edge of Lagoon.
8	11:56 a.m.	Pumping area adjacent to Lagoon.
9	12:03 p.m.	Carbon adsorption drum located between portable plant and storage tanks.
10	12:03 p.m.	Processed tar decanter sludge storage tank and DOERR mixed material tank.
11	12:07 p.m.	7-7 Inc. portable mixing-grinding plant for tar decanter sludge.
12	12:07 p.m.	View of open tar boxes adjacent to portable plant.
13	12:27 p.m.	View looking South toward Peter's Creek Lagoon. Photo taken from Allegheny County Ambient Air Monitoring Station on 3rd Street.
14	12:30 p.m.	View of Aristech Plant (center of photo) located at North end of U.S. Steel Clairton Coke Works. Photo taken from Allegheny County Ambient Air Monitoring Station. View looking East.

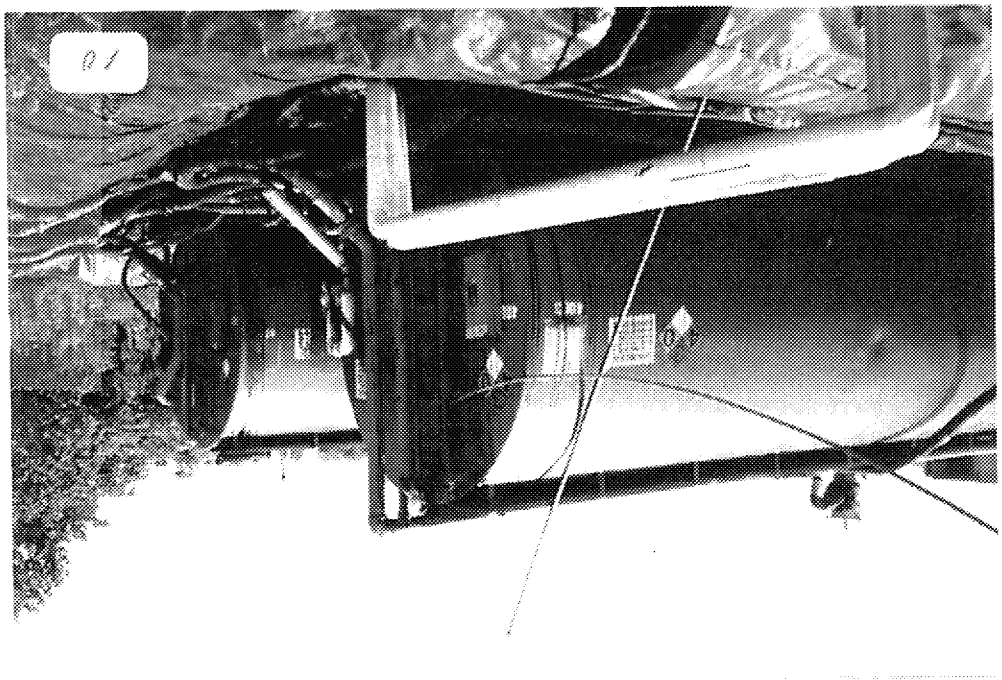


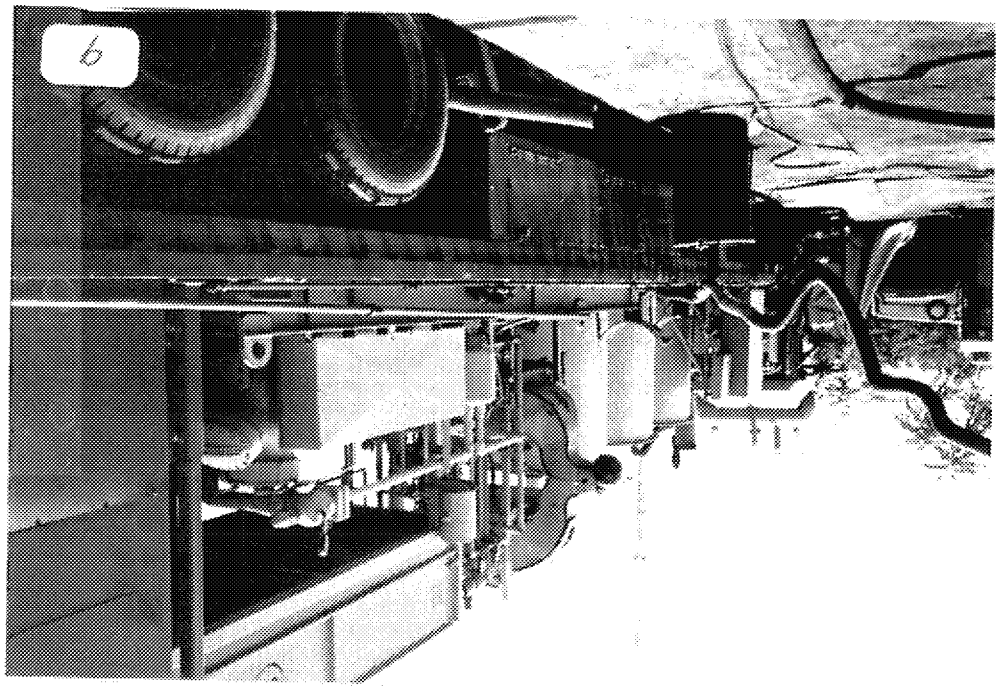












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ATTACHMENTS

A1

From: Carrie Deitzel (CDEITZEL)
To: MIoff
Date: Monday, July 12, 1993 6:01 pm
Subject: USX Clairton Coke Works

The following is an account of the conversation I relayed to you earlier. As you requested, I am providing same in writing:

Mayor Dominic Curinga of Clairton, PA contacted me this afternoon to make a complaint. He said that he had received several complaints of bad odors emanating from the USX facility in Clairton. He also said he has been a local resident for 39 years, and the odors about which residents are complaining are not those generally associated with the coke works. They are completely new to the community.

Mayor Curinga says he has spoken with workers from the facility who wish to remain anonymous but who told him that toxic waste is being burned in the coke ovens.

According to Mayor Curinga, a "tar-like resin" is being mixed with coke (or coal) and burned, and the tar-like substance is, reportedly, also being burned alone in one oven in what he called Battery 1-3. He did not know which oven in the group is used this way.

The mayor says the material is trucked into the facility, usually arriving at night.

He wants to know if anyone from EPA can meet with him to discuss this and possibly to investigate this. He is very concerned that EPA will inadvertently "tip off" the facility by contacting local authorities.

412/233 5913 City Hall

Mr. Curinga's home number is 412/233-5935. His work number is 412/422-6944. Please let me know how you plan to respond to this, because I promised the gentleman a response. I am available at x6728. Thanks for your help.

ccdeitzel

CC: WToffel, DMLohman

Davy International

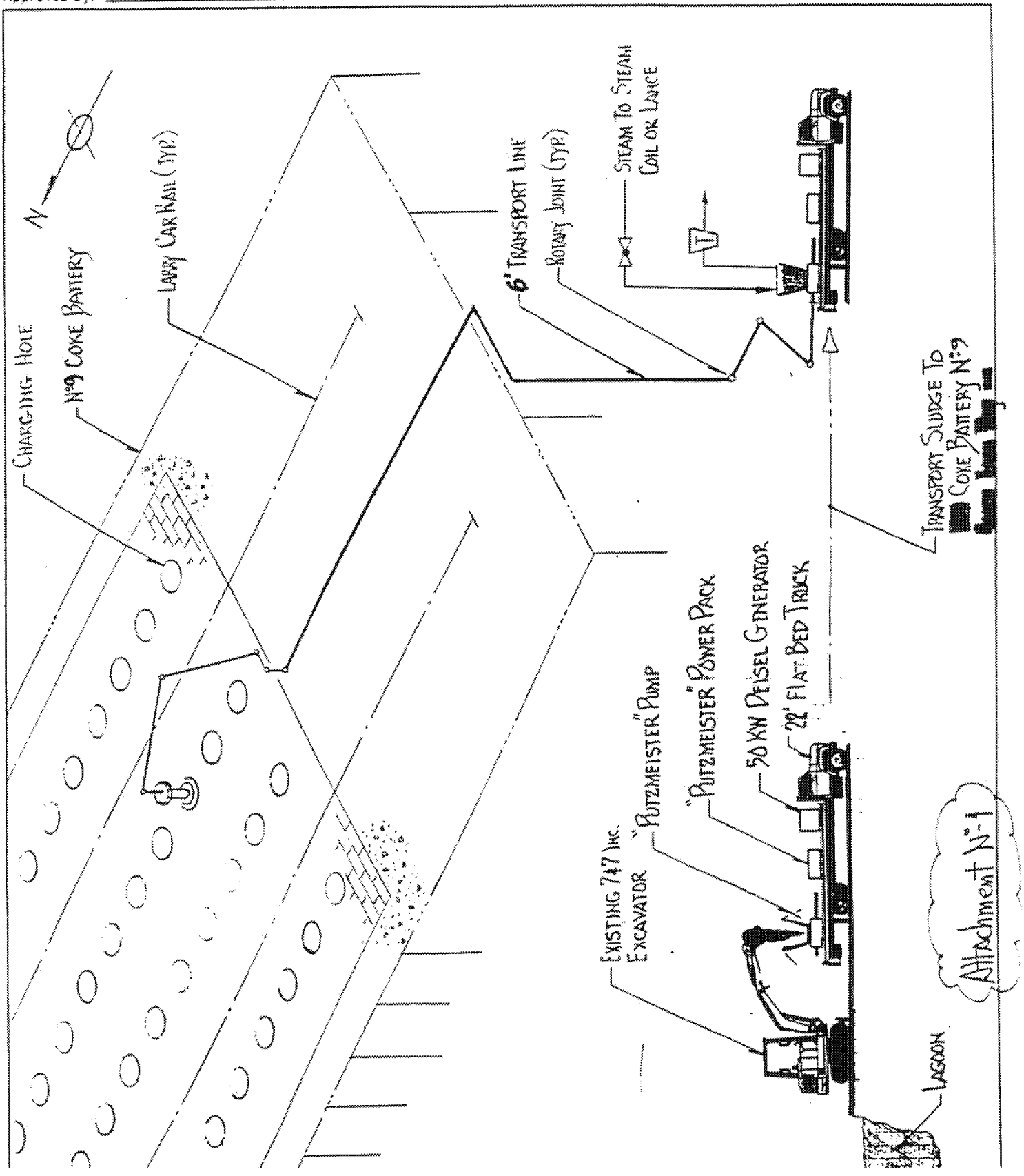
B1

Calculation

Customer: USSteel
Project Title: Peters Creek Lagoon
Subject: R/L Material to Coke Ovens

Made By: P.F. Adams Date 20 May 93
Reviewed By: Date
Approved By: Date

Calculation No.:
Rev. No.:
Rev. Date:
Contract No.: 93T100
Division/Sect.:
Item No.:
Drawing No.:



Davy International

82

Calculation

Customer: USSteel
Project Title: PCL
Subject: COKE Battery N°9 - PCL Injection Piping
Made By: P.F. Adams Date 15 June 93
Reviewed By: Date
Approved By: Date

Calculation No.:
Rev. No.:
Rev. Date:
Contract No.: 937100
Division/Sect.: E&C
Item No.:
Drawing No.: